

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA,
INC., THE PURDUE FREDERICK COMPANY,
INC. d/b/a THE PURDUE FREDERICK
COMPANY, P.F. LABORATORIES, INC.,
ABBOTT LABORATORIES, ABBOTT
LABORATORIES, INC., MICHAEL FRIEDMAN,
HOWARD R. UDELL, PAUL D. GOLDENHEIM,
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.
i through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

FILED
2007 NOV -1 PM 10:50
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Christopher A. Seeger, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Arnold Levin
Levin, Fishbein, Sedran & Berman
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500
Fax: (215) 5921-4663

Arnold Levin is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against him in any State or Federal Court. Attached hereto as Exhibit 1 is Mr. Levin's Affidavit, with Exhibit A, an original Certificate of Good Standing from the Pennsylvania Supreme Court.

11-1-07 3:26 PM 609137

Dated: October 31, 2007

Respectfully Submitted,

SEEGER WEISS LLP

By: 

Christopher A. Seeger (CS-4880)

One William Street

New York, NY 10004

Telephone: (212) 584-0700

Facsimile: (212) 584-0799

Counsel for Plaintiff and the Class

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND)	
COMMERCIAL WORKERS UNION’S AND)	
EMPLOYERS’ HEALTH AND WELFARE TRUST)	
FUND, on behalf of itself and all others similarly)	Civil Action No. 07-cv-6916 -JGK
situated,)	
Plaintiff,)	
)	
v.)	AFFIDAVIT OF CHRISTOPHER
)	A. SEEGER IN SUPPORT OF
PURDUE PHARMA L.P., PURDUE PHARMA,)	MOTION TO ADMIT COUNSEL
INC., THE PURDUE FREDERICK COMPANY,)	<i>PRO HAC VICE</i>
INC. d/b/a THE PURDUE FREDERICK)	
COMPANY, P.F. LABORATORIES, INC.,)	
ABBOTT LABORATORIES, ABBOTT)	
LABORATORIES, INC., MICHAEL FRIEDMAN,)	
HOWARD R. UDELL, PAUL D. GOLDENHEIM,)	
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.)	
1 through 20,)	
)	
Defendants.)	

State of New York)
)ss:
County of New York)

Christopher A. Seeger, being duly sworn, hereby deposes and says as follows:

1. I am a member of Seeger Weiss LLP, counsel for Movant, New Mexico United Food and Commercial Workers Union’s and Employers’ Health and Welfare Trust Fund (“Movant”), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Movant’s motion to admit Arnold Levin as counsel *pro hac vice* to represent Movant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.


3. I have known Arnold Levin since 2000.

4. I have found Mr. Levin to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Arnold Levin, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Arnold Levin, *pro hac vice*, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Arnold Levin, *pro hac vice*, to represent Movants in the above-captioned matter, be granted.



Christopher A. Seeger

Sworn before me this 31st day
of OCTOBER, 2007



NOTARY PUBLIC

Jose D. Mora
Notary Public State of New York
No. 00-0002383 Qualified In Bronx County
Certificate Filed in New York County
Commission Expires August 6, 2009

CERTIFICATE OF SERVICE


I, Christopher A. Seeger hereby certify that on October ~~31~~ 2007, I caused a true and correct copy of the foregoing document, *Motion to Admit Counsel Pro Hac Vice*, to be served via U.S. mail, with proper postage prepaid, on all counsel of record at the following addresses:

Michael Colbert Hartmere, Esq.
Matthew Terrence McLaughlin, Esq.
VENABLE (NYC)
405 Lexington Ave, 62nd Floor
New York, NY 10174
T. (212)-307-5500
F. (212)-307-5598 (fax)

Counsel for defendants Abbott Laboratories, Abbott Laboratories, Inc.

Alexandra Katherine Nellos, Esq.
Donald I. Strauber, Esq.
Phoebe Anne Wilkinson, Esq.
Mary Therese Yelenick, Esq.
CHADBOURNE & PARKE LLP (NY)
30 Rockefeller Plaza
New York, NY 10112
T. (212) 408-5100
F. (646) 710-1189

Counsel for defendants P.F. Laboratories, Inc., Purdue Pharma, Inc., Purdue Pharma, L.P., The Purdue Fredrick Company, Inc., Howard R. Udell, Michael Friedman, Paul D. Goldenheim



Christopher A. Seeger

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

V.

PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE PURDUE FREDERICK COMPANY, INC. d/b/a THE PURDUE FREDERICK COMPANY, P.F. LABORATORIES, INC., ABBOTT LABORATORIES, ABBOTT LABORATORIES, INC., MICHAEL FRIEDMAN, HOWARD R. UDELL, PAUL D. GOLDENHEIM, JOHN DOE Nos. 1 through 20, and JANE DOE Nos. 1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

**AFFIDAVIT OF ARNOLD
LEVIN, ESQUIRE**

I, Arnold Levin, Esquire, a partner of Levin, Fishbein, Sedran & Berman, located in Philadelphia, Pennsylvania, declare the following under penalty of perjury:

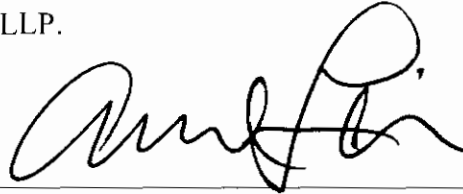
1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and am admitted to practice before the Supreme Court of Pennsylvania, United States District Court for the Eastern District of Pennsylvania, United States District Court for the Middle District of Pennsylvania, the Third, Fourth, Sixth, Seventh, Tenth and Eleventh Circuit Courts of Appeals and the United States Supreme Court.

2. Attached hereto is my Certificate attesting to my admission and that I am a member in good standing of the bar of the Commonwealth of Pennsylvania.

3. I have extensive experience in state and federal trial courts. Amongst my experiences I was appointed by the Honorable Sam J. Pointer as a member of the plaintiffs' Steering

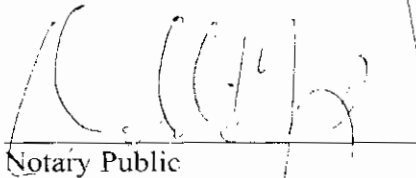
Committee in the *Silicone Gel Breast Implants Products Liability Litigation*, Master File No. CV-92-P-10000-S. The Honorable Louis L. Bechtle appointed me as Co-Lead Counsel of the Plaintiffs' Legal Committee and Liaison Counsel in the MDL proceeding of *In re Orthopedic Bone Screw Products Liability Litigation*, MDL 1014 (E.D. Pa.). I also serve as Co-Chairman of Plaintiffs' Management Committee, Liaison Counsel, and Class Counsel in *In re Diet Drug Litigation*, MDL 1203. I am also a member of a four lawyer Executive Committee in *In re Rezulin Products Liability Litigation*, MDL No. 1348 (S.D.N.Y.); a member of the Plaintiffs' Steering Committee in *In re Vioxx Products Liability Litigation*, MDL No. 1657 (E.D.La.) and a member of a seven person Steering Committee in *In re Propulsid Products Liability Litigation*, MDL No. 1355 (E.D. La.).

4. Based upon the foregoing, I respectfully request admission to this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for Southern District and Eastern District of New York, for the purpose of appearing and arguing on behalf of plaintiff, which is represented by the firm, Seeger Weiss LLP.

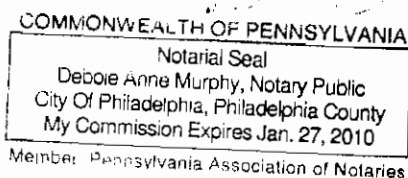


ARNOLD LEVIN

Sworn before me this 12th day
of October, 2007



Notary Public





Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Arnold Levin, Esq.

DATE OF ADMISSION

November 16, 1964

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: October 16, 2007**


Patricia A. Johnson
Chief Clerk

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NEW MEXICO UNITED FOOD AND)	
COMMERCIAL WORKERS UNION’S AND)	
EMPLOYERS’ HEALTH AND WELFARE TRUST)	
FUND, on behalf of itself and all others similarly)	Civil Action No. 07-cv-6916-JGK
situated,)	
Plaintiff,)	
)	
v.)	ORDER FOR ADMISSION
)	PRO HAC VICE ON
PURDUE PHARMA L.P., PURDUE PHARMA,)	WRITTEN MOTION
INC., THE PURDUE FREDERICK COMPANY,)	
INC. d/b/a THE PURDUE FREDERICK)	
COMPANY, P.F. LABORATORIES, INC.,)	
ABBOTT LABORATORIES, ABBOTT)	
LABORATORIES, INC., MICHAEL FRIEDMAN,)	
HOWARD R. UDELL, PAUL D. GOLDENHEIM,)	
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.)	
1 through 20,)	
)	
Defendants.)	

Upon the motion of Christopher A. Seeger, attorney for New Mexico United Food and Commercial Workers Union’s and Employers’ Health and Welfare Trust Fund, and said sponsor attorney’s affidavit in support;

IT IS HEREBY ORDERED that:

Arnold Levin
Levin, Fishbein, Sedran & Berman
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500
Fax: (215) 5921-4663
ALevin@lfsblaw.com

is admitted to practice *pro hac vice* as counsel for New Mexico United Food and Commercial Workers Union’s and Employers’ Health and Welfare Trust Fund in the above-captioned case in

the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: October __, 2007
New York, New York

United States District Court Judge